



JON M. HUNTSMAN, JR.  
Governor

GARY R. HERBERT  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Forestry, Fire and State Lands

A. JOEL FRANSEN  
State Forester/Division Director

May 29, 2007

Great Salt Lake Minerals Corporation  
c/o Corey Milne  
765 North 10500 West  
Ogden, Utah 84402

RE: May 3, 2007 Simultaneous Offering

Dear Corey:

The purpose of this letter is to follow up on the May 3, 2007 mineral lease offering by the Division of Forestry, Fire and State Lands for 23,088 acres of sovereign land in Box Elder County.

The bids were opened on May 29, 2006 at 10:00 a.m. Pursuant to state law and Rules Governing the Management of Sovereign Lands and Forestry and Fire Control in Utah, the bid submitted by Great Salt Lake Minerals Corp. was the successful bidder. According to rule, the following items are required as part of the application:

1. Electronic copy of GSL Ponds Complex West Ponds GA with Dolphin Island 18 k Expansion Alt. 3 Dated 2/20/2007. A CAD file or shape file of the expansion pond is needed to complete the application.

After receiving a completed application and following the issuance of the Record of Decision, you will receive a lease within 30 days for execution.

Enclosed are the results of the offering. If you have any questions please call me at 801.538.5504.

Yours sincerely,

Dave Grierson  
Planner/Sovereign Lands Coordinator

DG:jw

cc: Reader file  
Lease file





## State of Utah

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## Office of the Governor PUBLIC LANDS POLICY COORDINATION

LYNN H. STEVENS  
*Public Lands Policy Coordinator*

RESOURCE DEVELOPMENT COORDINATING COMMITTEE  
*Public Lands Section*

April 28, 2007

Dave Grierson  
Division of Forestry, Fire and State Lands  
1594 West North Temple  
Suite 3520  
Salt Lake City, Utah 84116

SUBJECT: Mineral lease, near Clyman Bay, Great Salt Lake  
Project No. 07-7820

Dear Mr. Grierson:

The Resource Development Coordinating Committee (RDCC) has reviewed this mineral lease nomination for the Clyman Bay area of the north arm of the Great Salt Lake (GSL). The approximately 23,000 acres proposed for leasing contain shoreline playa and mudflat wetlands, along with waters of the Great Salt Lake. The intent of the mineral lease nomination is to create solar evaporation ponds for the concentration of brines and commercial production of potassium fertilizer. Upon approval, several miles of dikes will be installed, along with water "feeder" channels and pump stations.

In light of your public trust responsibility in managing the resources of the Great Salt Lake on behalf of the State of Utah, this office recommends that you take into full account the following agency and public comments regarding the project in deciding your course of action.

The Utah Division of Wildlife Resources (UDWR) comments:

**Potential impacts to Gunnison Island nesting birds.**

- The construction process and proximity of the lease to Gunnison Island may disrupt nesting American White Pelicans, California gulls, and peregrine falcons. Currently there is a one (1) mile buffer surrounding the island to minimize disturbance. This buffer was intended to provide security for the nesting birds on the island from boats or airplanes. However, it does not take into account permanent structures, such as dikes or oil rig platforms that may increase the likelihood of disrupting nesting colonial species. The current dikes in Clyman Bay are approximately 4 miles away from the island and the proposed dikes would be only 2 miles away. The proximity of newly constructed dikes may provide predators, as well as human trespassers, easier access to Gunnison Island. Pelicans are known to be highly susceptible to any disturbance and will, at times, totally abandon nesting sites. Pelicans completely abandoned Hat Island (in the South Arm of the GSL) in the 1960's due to human disturbances. Gunnison Island is the third largest breeding colony for American White Pelicans in North America. The security and

protection of this habitat is thus imperative to this known nesting site.

- Juvenile pelicans may confuse the proposed ponds with a potential forage site and become weakened and trapped within them until they succumb to the elements. This has occurred at the U.S. Mag site which is much farther away along the south shore of the GSL.
- The constructed dikes may also provide breeding areas for California gulls that could increase gull predation on pelicans.

**Potential impacts to other wildlife.**

- Constructed dikes and filling of ponds may eliminate springs within the leased area that provide critical wildlife water sources and potential nesting habitat for snowy plovers, a state sensitive species.
- Because insufficient data exists, it is unknown whether the presence of permanent ponds on the western shoreline of the GSL may impact other wildlife species, such as small mammals and raptors. We recommend surveys be conducted to assess the bird and mammal populations present in Clyman Bay.
- Construction of a pond within a few miles of Dolphin Island may also affect nesting waterbird species such as double-crested cormorant, gulls, great blue herons and Caspian terns.

**Potential impacts to North Arm salinity, habitat and ecology.**

The GSL is of hemispheric importance to migratory waterbirds (waterfowl, shorebirds and wading birds), as many species use the GSL as nesting, feeding and staging areas. At times, millions of birds may be found on the GSL and the surrounding wetland/upland habitat complexes. Since the GSL is a dynamic system, with the lake elevation changing seasonally and annually, the abundance and location of habitats continually change over time. These changes create a continual diversity and continuity of available habitats, such that wildlife will move around the GSL to find those habitats that supply their needs. It is because of these habitats that the GSL has become critically important to wildlife, with the Lake sometimes supporting over 50% of the worldwide populations of some avian species.

When trying to understand wildlife populations on the GSL, the lake waters and habitats within and surrounding the lake must be evaluated in the context of the current lake elevation, along with an understanding of the ever-changing water elevations and precipitation events. Avian use of the GSL waters and habitats can shift greatly with subtle changes in lake elevation because of the low gradient bottom. The presence of the evaporation ponds would eliminate a large portion of mudflat and shoreline habitat during these shifts in lake ecology. Salinity in the North Arm changed substantially as recently as the high water years of the 1980s and early 1990s. During this time, the entire lake's ecology and available habitats changed dramatically:

- Eared grebes (1-3million) shifted their staging pattern from the South Arm to the North Arm.
- Commercial brine shrimp harvesters harvested in the North Arm instead of the South Arm to follow the shift in the brine shrimp population from the South Arm to the North Arm.
- Brine fly populations shifted to the North Arm.
- Shorebirds and other wildlife shifted/expanded their ranges to the North Arm.
- Brine flies are the predominant food item for most migratory shorebirds that visit the lake. During their life cycle, they must anchor to bioherms or stromatolites that form on the lake floor. These calcium carbonate structures appear to be essential to the reproductive life cycle of brine flies and are important to the brine shrimp population. At certain times of the year, brine shrimp sustain themselves by feeding on or near these productive structures. The structures are also

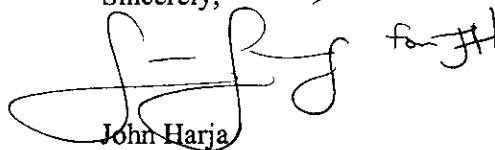
essential to what is possibly the largest inland U.S. concentration of wintering Common Goldeneye. The creation of the causeway increased north arm salinity which made these bioherms unavailable to brine flies. However, when the GSL elevation increases and the salinity is less within the north arm, these structures are again available for use by brine flies. Bioherms are only found in a few areas of the GSL and they have been found within the area of the proposed lease in Clyman Bay. This area of Clyman Bay, if diked as an evaporation pond, will lose its bioherm structures.

Due to the known recent ecological shifts in the GSL, the extensive wildlife concerns associated with the diking of 23,000 acres of Clyman Bay and the associated 8,000 acre diking planned for Bear River Bay, UDWR recommends that greater site-specific analysis and survey data be completed prior to leasing. One source for such information may be the EIS currently being developed regarding the proposed expansion project that will generate site specific analysis and information regarding potential impacts to wildlife, wetlands, water quality and GSL ecology. Evaluating this site specific information is one approach to assist you in assessing the public trust resources of the GSL.

We appreciate the opportunity to comment on this proposal and we look forward to working with the Division of Forestry, Fire and State Lands and the federal natural resource agencies in the future to protect the public trust resources on the Great Salt Lake.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Resource Development Coordinating Committee, Public Lands Section, at the above address or call the Director, Jonathan G. Jemming at (801) 537-9023 or Carolyn Wright at (801) 537-9230. Attached are comments received from Western Resource Advocates and from the lease applicant, Great Salt Lake Minerals.

Sincerely,

A handwritten signature in black ink, appearing to read "John Harja", with a stylized flourish to the right.

John Harja  
Assistant Director  
For Policy and Planning

/attachment

**From:** "Corey Milne" <milnc@compassminerals.com>  
**To:** "Dave Grierson (Sovereign Lands)" <davegrierson@utah.gov>  
**Date:** 4/25/2007 11:16 AM  
**Subject:** FW: GSL Comments for RDCC  
**Attachments:** Pond Expansion Statement.doc

I would like to arrange a meeting with Governor Huntsman with me, my boss, Ron Bryan, Vice President of Great Salt Lake Minerals, and his boss, Angelo Brisimitzakis, CEO of our parent corporation, Compass Minerals, to introduce ourselves and our business. Ron and Angelo work in the corporation's Overland Park, Kansas office. I have been told by the Governor's office that such a meeting needs to be arranged through the agency with which I am working. Could you make such an arrangement or put me in contact with the person that could?

---

**From:** COREY MILNE  
**Sent:** Wednesday, April 25, 2007 10:59 AM  
**To:** Dave Grierson (Sovereign Lands)  
**Cc:** 'CarolynWright@utah.gov'; 'jjemming@utah.gov'  
**Subject:** GSL Comments for RDCC

Attached is a description of Great Salt Lake Minerals' expansion plans that I would like attached to the RDCC State Action Proposal that you submitted to the RDCC in response to my lease nomination for more pond area on the Great Salt Lake. This document provides additional information to assist the RDCC in its review.

**From:** "S. Blaise Chanson" <bchanson@bio-west.com>  
**To:** "Dave Grierson" <davegrierson@utah.gov>  
**Date:** 5/30/2007 12:13 PM  
**Subject:** Re: Pelican information for Bowdoin NWR

**CC:** <Milnc@compassminerals.com>  
Thanks for the information, Dave.

We have conducted one series of transects at Clyman Bay, on 18 May. No shorebird use was noted anywhere within the proposed project area, including the shoreline extending up to Dolphin Island. No other avian use was noted within the project area.

Our biologists are on site again today to conduct another series of observations along our transects. We will conduct another 2 series of observations during June. All surveys are done approximately 2 weeks apart.

Again, thanks for the references.

Blaise

At 08:15 AM 5/29/2007 -0600, Dave Grierson wrote:

>Blaise,

>

>Sorry I took so long to reply. The following article talks about the  
>management of the American white pelicans (AWP) and the "human  
>disturbance" that it refers to is hunting, which is very different than  
>the concerns raised by the folks opposed to the project.

>[http://fwp.mt.gov/fieldguide/detail\\_ABNFC01010.aspx](http://fwp.mt.gov/fieldguide/detail_ABNFC01010.aspx)

>

>The map of Bowdoin National Wildlife Refuge shows the scenic refuge road  
>within 1 mile of the pelican islands. Note also the proximity of US  
>Highway 2 to the North (2.5 miles) and the Burlington Northern Railroad to  
>the south (2.5 miles):

><http://www.fws.gov/bowdoin/documents/BowdMapWeb.pdf>

>

>The map of Medicine Lake shows similar proximities of roads to the lake's  
>islands. This is another important AWP nesting colony (also increasing in  
>numbers).

><http://www.fws.gov/medicinelake/Hunting/Regs%20and%20Map.pdf>

>

>I haven't found any refuge where there is claim that the numbers of AWP's  
>are declining. Of course, they are all taking credit for the increasing  
>numbers through their management efforts.

>

>Have you found any significant wildlife use in the Clyman Bay/Gunnison Bay  
>portion of the project? Did the transects yield any sightings?

>

>Dave

>

>Dave Grierson

>Planner/Sovereign Lands Coordinator

>PO Box 145703

>Salt Lake City, UT 84114-5703

>[davegrierson@utah.gov](mailto:davegrierson@utah.gov)

>801.538.5504

>  
>  
> >>> "S. Blaise Chanson" <bchanson@bio-west.com> 5/16/2007 12:22 PM >>>  
> Dave.....  
>  
> At the AWRA conference yesterday, you mentioned reading an article  
> regarding white pelicans at Bowdoin NWR and the influence of human  
> disturbance.  
>  
> Can you please give me the reference, so I can review.  
>  
> Thanks, Dave.  
>  
> Blaise  
>  
> S. Blaise Chanson  
> BIO-WEST, Inc.  
> 1063 West 1400 North  
> Logan, UT 84321  
>  
> Telephone: (435) 752-4202  
> Fax: (435) 752-0507

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BIO-WEST, Inc.  
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Logan, UT 84321

Telephone: (435) 752-4202  
Fax: (435) 752-0507

**From:** "S. Blaise Chanson" <bchanson@bio-west.com>  
**To:** "Dave Grierson" <davegrierson@utah.gov>  
**Date:** 6/12/2007 9:45 AM  
**Subject:** Re: Updates on avian activity in Clyman Bay  
  
**CC:** <Milnc@compassminerals.com>  
Dave.....

Our biologists conducted on-site surveys of potential shorebird habitat at Clyman Bay area on May 16 and May 30.

Each survey included 7.5 miles of transects between the UPRR and the existing GSLM ponds in the area proposed for pond expansion. In addition, reconnaissance transects of approximately 9.5 miles were driven by ATV along the west shoreline between the existing GSLM ponds and approximately Dolphin Island - the area proposed for the Dolphin Island evaporation pond. The ATV transect included stopping at least at every quarter mile and extensively observing the surrounding area with binoculars.

No shorebird or other water-related avian use was observed during these two surveys.

As part of the aerial avian surveys, a very low elevation helicopter reconnaissance was conducted yesterday (June 11) of Clyman Bay. No evidence of shorebird use (including tracks) was noted anywhere along the Clyman Bay shoreline.

Our biologists will conduct 2 more surveys in June: Tomorrow (June 13) and June 27th.

Blaise

At 03:48 PM 6/11/2007 -0600, you wrote:

>Blaise,  
>  
>I was just wondering if there were any further surveys in the proposed  
>evaporation pond areas in the west desert, and if so, what were the results?  
>Thanks.  
>  
>Dave  
>  
>  
>Dave Grierson  
>Planner/Sovereign Lands Coordinator  
>PO Box 145703  
>Salt Lake City, UT 84114-5703  
>davegrierson@utah.gov  
>801.538.5504

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**From:** "John CAVITT" <JCAVITT@weber.edu>  
**To:** <davegrierson@utah.gov>  
**Date:** 6/12/2007 3:45 PM  
**Subject:** GSL Minerals Expansion Proposal

Hello Dave

Would you mind adding me to the notification list for the GSL Minerals Expansion Proposal? I would like to take a look at the ROD once it has been issued.

Thanks  
JFC

John F. Cavitt PhD, Director  
Office of Undergraduate Research  
Associate Professor

Mailing Address  
Dept. of Zoology  
Weber State University  
2505 University Circle  
Ogden, UT 84408-2505

(801) 626-6172  
(801) 626-8541  
Avian Ecology Lab  
(801) 626-8634  
cell: (801) 791-4438  
FAX: (801) 626-6861  
homepage: <http://faculty.weber.edu/jcavitt>  
<http://departments.weber.edu/avianecologylab>

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

Aldo Leopold

**From:** "Chris Montague" <cmontague@TNC.ORG>  
**To:** <davegrierson@utah.gov>  
**Date:** 6/13/2007 1:36 PM  
**Subject:** Request for ROD

Dave -  
Please add my name to those who receive the final ROD on the GSL Minerals  
request -  
Thanks,  
Chris Montague

Director of Conservation Programs  
The Nature Conservancy in Utah  
559 East South Temple  
Salt Lake City, Utah 84102

cmontague@tnc.org

**From:** <birderb@aol.com>  
**To:** <davegrierson@utah.gov>  
**Date:** 6/13/2007 9:41 PM  
**Subject:** ROD Notification Request  
**CC:** <jcbellmon@msn.com>, <d-dobrien@comcast.net>, <wmartinson@xmission.com>,...

Dave:

Please notify and add me to your database, Policy Advocate for the Utah Audubon Council when the ROD for mineral leases for the Great Salt Lake Minerals Expansion proposal is issued. ?

Regards,

Bill Fenimore  
Utah Audubon Policy Advocate  
1860 North 1000 West  
Layton, UT 84041-1858  
801-525-8400 Business  
801-525-8415 Fax  
801-699-9330 Cellular

Mailing List - ROD 07-0601-200 00107									
Company	LName	Fname	Address	City	ST	ZIP	Comment	Notif	
Great Salt Lake Minerals	Milne	Corey	765 North 10500 West	Ogden	UT	84402	Applicant	ROD	
William Colman	Colman	William	232 South 800 East	Salt Lake City	UT	84102	Adj Landowner	Letter	
Bureau of Land Management	Matovich	Jeanette	440 West 200 South, Suite 500	Salt Lake City	UT	84401	Adj Landowner	Letter	
H U Grazing Partnership	Schipp	Myrna Beth	2402 West 4700 South	Roy	UT	84607	Adj Landowner	Letter	
Young Resources Limited Partnership			4990 North Highway 38	Brigham City	UT	84302	Adj Landowner	Letter	
School and Institutional Trust Lands	Wilcox	Rick	675 East 500 South, Suite 500	Salt Lake City	UT	84102-2818	Adj Landowner	Letter	
Friends of the Great Salt Lake	De Freitas	Lynn	PO Box 2655	Salt Lake City	UT	84110-2655	Interested Party	ROD	
Ducks Unlimited, Inc	McCreary	Jeff	3074 Gold Canal Drive	Rancho Cordov	CA	956709	Interested Party	ROD	
Utah Audubon Policy Advocate	Fenimore	Bill	1860 North 1000 West	Layton	UT	84041-1858	Interested Party	ROD	
Dept of Zoology Weber State University	Cavitt, PhD	John F	2505 University Circle	Ogden	UT	84408-2505	Interested Party	ROD	
The Nature Conservancy	Montague	Chris	559 East South Temple	Salt Lake City	UT	84102	Interested Party	ROD	
Fabian & Clendenin	Ray	John F	PO Box 510210	Salt Lake City	UT	84151	Interested Party	ROD	